

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

No. 19-cr-00251-LM

JOHNATHON IRISH

**AFFIDAVIT OF JILLIAN KALOSKY**

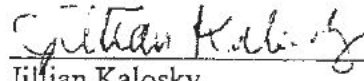
On July 6, 2020, personally appeared before me, via video, the above-named Jillian Kalosky, known to me, the undersigned Justice of the Peace, or proven to be the same, who affirmed under penalty of perjury that the following statement is true to the best of her knowledge, information, and belief:

1. My name is Jillian Kalosky.
2. I am a licensed New Hampshire private investigator.
3. I was hired to work as an investigator by Attorney Richard Guerriero, counsel for Johnathon Irish.
4. The results of my investigation include the following:
  - a. A witness not interviewed by trial counsel, "VW," provided details establishing that Stephanie Irish was making efforts to get out of the marriage and get Mr. Irish out of the house by whatever means. The interview with VW confirmed the following information:
    - i. Stephanie was in a relationship with Donnie Trent while married to Mr. Irish and while VW was married to Trent.
    - ii. Stephanie and Trent communicated frequently and used various means to conceal their communications.

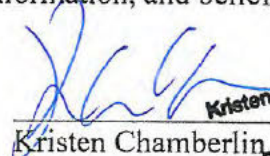
- iii. VW remembers messages from about two and a half years ago, which include the following: “[Stephanie] had messaged Donnie that she was tired of John supposedly cheating on her. She needed him put away so her and her kids could be free of him because, even if she tried to move to her mom’s, he’d follow her. So, Donnie said something along lines of, ‘I can make that happen. I know a few people.’”
- iv. VW stated that “I know [Donnie] used to have affiliates with the Hells Angels and Outlaws from the Laconia/Meredith area all the way down to Rochester.”
- b. At one point during Littleton Police interactions with Stephanie and Mr. Irish, Mr. Irish provided the Littleton Police with a security video which had captured Stephanie Irish repeatedly, and seemingly without provocation, assaulting Mr. Irish. This video was from early December of 2019. Defense counsel’s investigator was able to make a 91-A (public records) request for this video and obtained a copy.
- c. It was also determined that during Littleton Police interactions with Stephanie and Mr. Irish from October to December of 2019, conversations with Stephanie were captured on the police bodycams. Mr. Irish believes that Trial counsel did not obtain these bodycam recordings prior to trial. When current defense counsel’s investigator made an inquiry, she was informed that the video was “purged after 90 days” and is no longer available.

I swear these statements are true to the best of my knowledge, information, and belief.

July 6, 2020, at Keene, New Hampshire.

  
Jillian Kalosky

On July 6, 2020, appeared before me via video the above-named Jillian Kalosky, known to me, or proven to be the same, who affirmed under penalty of perjury that the foregoing statements are true, to the best of her knowledge, information, and belief.

  
Kristen Chamberlin  
Justice of the Peace - New Hampshire  
Justice of the Peace/Notary Public  
My Comm. Expires Nov 28, 2024